

MUR # 6846

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FEDERAL ELECTION  
COMMISSION  
2014 JUN 24 PM 1:33  
OFFICE OF GENERAL  
COUNSEL

From: Noah Robinson – Treasurer, Art Robinson for Congress  
To: Federal Elections Commission

Dear Sir/Madam:

Enclosed is a complaint which we are hereby submitting concerning actions taken by Peter DeFazio through the DeFazio for Congress campaign, which are clearly unethical and also illegal based on our understanding of FEC law.

Art Robinson is running against DeFazio in 2014 for Oregon's 4<sup>th</sup> District U.S. House seat as he did in 2010 and 2012 (both men were unopposed in the May 20<sup>th</sup>, 2014 primary).

Peter DeFazio prevailed in the 2010 & 2012 elections, partly because of an unprincipled impersonation campaign described in this complaint.

It is NOT our intention to harass the DeFazio campaign with FEC complaints. We realize that this is a common political ploy, and we feel that it is wrong and wasteful of FEC resources.

In fact, DeFazio has in the past – through the Democrat Party – filed at least two FEC complaints with multiple claims against us (the main elements of which he had to know were false), both of which were unanimously dismissed by the Commissioners. These complaints were filed against the Art Robinson for Congress campaign, an entirely separate scientific research institute Art Robinson administers, and businesses run by Art Robinson's family (as well as another man who was simply a reseller for one of these businesses). Considerable legal expenses were involved in professional replies to these, because of concern for the entities involved.

DeFazio has also caused false complaints to be filed against us with the Secretary of State in Oregon, but these were dismissed without legal expenses because we responded on our own behalf to avoid the expense. These were filed and publicized during voting to influence an election and were eventually dismissed by the Secretary of State.

Although DeFazio's FEC and Oregon complaints were filed by other parties (we have heard this is sometimes done to insulate a campaign from the filing of the complaint), DeFazio himself supported them (there are press articles to prove this) and there is other evidence the DeFazio campaign was directly involved.

We are not interested in harassing DeFazio in this manner, even though he has done this to us. However, we are VERY concerned that something be done to prevent DeFazio from continuing with his illegal impersonation campaign during this 2014 election.

DeFazio's impersonation campaign has already damaged the personal and professional reputation of Dr. Art Robinson, and we expect DeFazio to repeat it this election cycle. After 2010 we informed DeFazio that we knew his activities in this regard were wrong and illegal. This made no difference, since DeFazio simply repeated it on a larger scale in 2012.

As a result of this my Dad (Art Robinson) consulted an attorney very late in the 2012 election cycle, because he had been told that there was an Oregon law that could be used to quickly stop

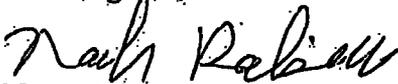
1-800-4-A-NOON

this kind of thing. The attorney recommended against using this law and instead recommended a lawsuit which he said he was sure would succeed. This turned out to be poor advice, since the lawsuit was eventually dismissed on the basis of Federal pre-emption.

I spoke briefly with Greg Scott about this while attending the FEC conference in Florida (Feb. 11<sup>th</sup> - 12<sup>th</sup>, 2014). He recommended that we submit a complaint. When I told him we wished to avoid the legal expenses, he said it was not necessary for it to be professionally written. He recommended we simply write up what happened. That is what we have done in the enclosed complaint. Obviously, we realize that Greg Scott's advice was based on my description of the problem to him, and he was in no way taking sides in the matter.

Please review the attached document and references and consider it our official filing of this FEC complaint. We did not seek legal advice about it. If there is anything which needs clarification or should be handled differently, please let us know. We would be happy to provide any additional information that you may request.

Best Regards,



Noah Robinson

Treasurer - Art Robinson for Congress

Subscribed and sworn to before me under penalty of perjury this 23<sup>rd</sup> Day of June, 2014.

By NOAH ROBINSON



State of Oregon County of Josephine



702444-1000

May 30, 2014

From:  
Art Robinson  
Federal Candidate for Congressional Office, District 4 Oregon

Cave Junction, OR 97523

To:  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Dear Sir/Madam:

We hereby submit the enclosed complaint about actions by Peter DeFazio, current congressman of District 4, Oregon, against whom Dr. Art Robinson is running for this congressional office in the 2014 election.

**Complaint Against Peter DeFazio for failure to properly identify campaign materials with required disclaimers.**

### Summary of Facts

#### **Failure to properly identify campaign materials with required disclaimers.**

In 2010 and again in 2012, Democrat Peter DeFazio, congressman of District 4, Oregon, was challenged by Republican Arthur Robinson for this congressional position. While District 4 has a significant Democrat registration majority, Robinson's unusually good personal and professional accomplishments and credentials created substantial voter interest. Robinson prevailed in four of the seven District 4 counties in both elections. (DeFazio had never lost more than one county before.) DeFazio prevailed in three. Those three are more populous, and DeFazio won both elections.

In these campaigns, DeFazio adopted a "straw man" strategy, painting Robinson as a "pathological nut job" and creating a fictional Robinson persona indicating this. For examples, DeFazio created Internet sites with fake Robinson positions, put up billboard advertisements pretending to be Robinson billboards, and then campaigned against the obviously objectionable straw man that he created through this false advertising. This strategy succeeded against a challenger who was politically unknown.

On the Internet, ads using Robinson's picture and similar campaign colors were used by DeFazio to direct voters to a web site that viewers were led to believe was Robinson's, but where Robinson was falsely portrayed. This web site was identified as produced by DeFazio, but the disclaimer was placed in such a way that most readers would be unlikely to notice it. As the campaigns preceded, DeFazio produced cartoon videos on the Internet with purported direct

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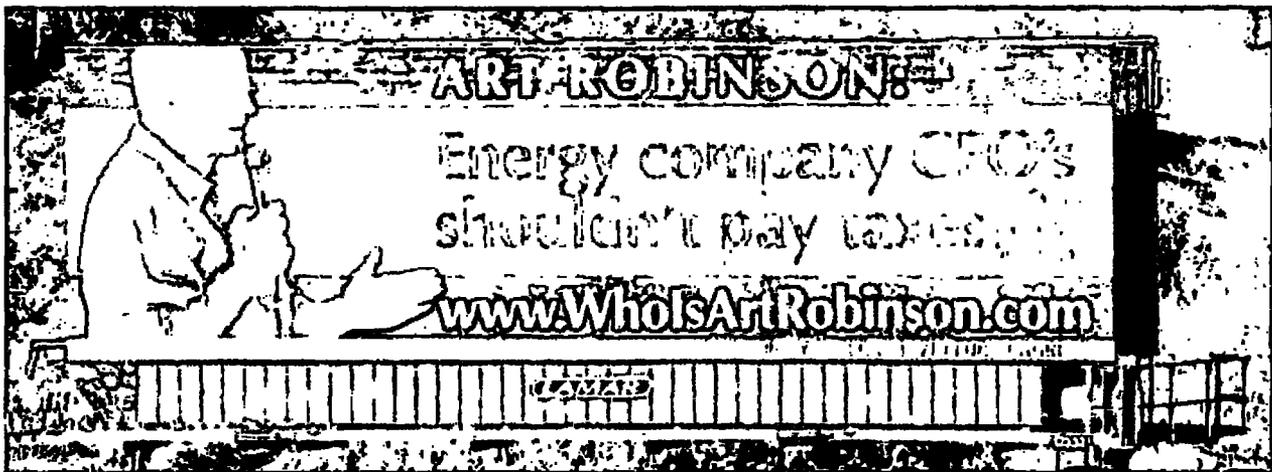
quotes from Robinson that were entirely fabricated by DeFazio – statements Robinson has never made and would never make.

Even enthusiastic Robinson supporters who know Robinson well were deceived, warning Dr. Robinson that they thought his Internet and Billboard advertising was not portraying him in a good light. Polls taken by Robinson in 2012 showed that 10s of thousands of voters believed that the many billboards that DeFazio had placed throughout the district were actually put up by Robinson.

When DeFazio began this strategy, he was more cautious. In 2010, for example, he placed a three billboards on Interstate Highway 5 that bisects District 4. One of these billboards is shown on page 47 of Robinson's book, *Common Sense in 2012*, enclosed with this complaint as Exhibit A and is reproduced in the photograph below. (Chapter 30 of this book, "Correction of DeFazio Misrepresentations" gives a general account of the DeFazio 2010 campaign.)

This billboard shows Robinson's picture, his name, a quoted Robinson statement that "Energy company CEO's shouldn't pay taxes," and the web site address created by DeFazio [www.WhoIsArtRobinson.com](http://www.WhoIsArtRobinson.com), all in clear large lettering. Robinson has never made this statement about energy company CEOs or any similar statement. There is a Defazio disclaimer on the billboard – with print so thin that it could not be read from the highway.

Also note that the pictures of Art Robinson on these billboards are ones that voters might believe Art Robinson would actually use. In other ads DeFazio commonly uses another picture chosen to make Art Robinson look as bad as possible (it was probably edited). It appears that DeFazio used an ordinary picture here, because he wanted voters to believe Art Robinson put up the billboard.



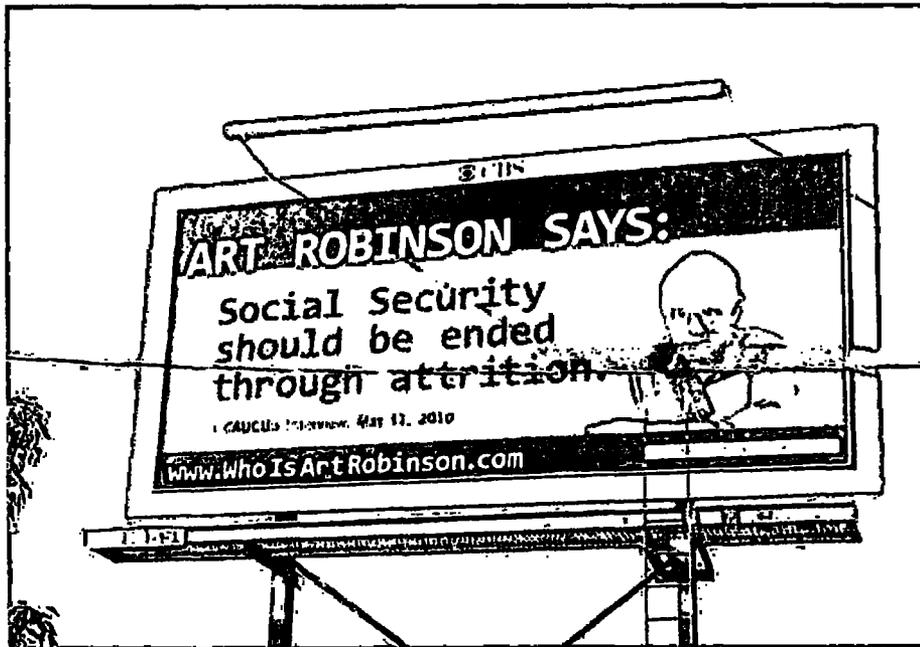
DeFazio Billboard with small disclaimer from 2010

Robinson warned DeFazio concerning this advertising. DeFazio letters to Robinson indicate that DeFazio personally read *Common Sense in 2012* which discusses this. Nevertheless, in 2012, DeFazio resumed and intensified the same campaign by Internet and billboards. DeFazio shouldn't have needed the warning. DeFazio is a 14 term congressman and should know better.

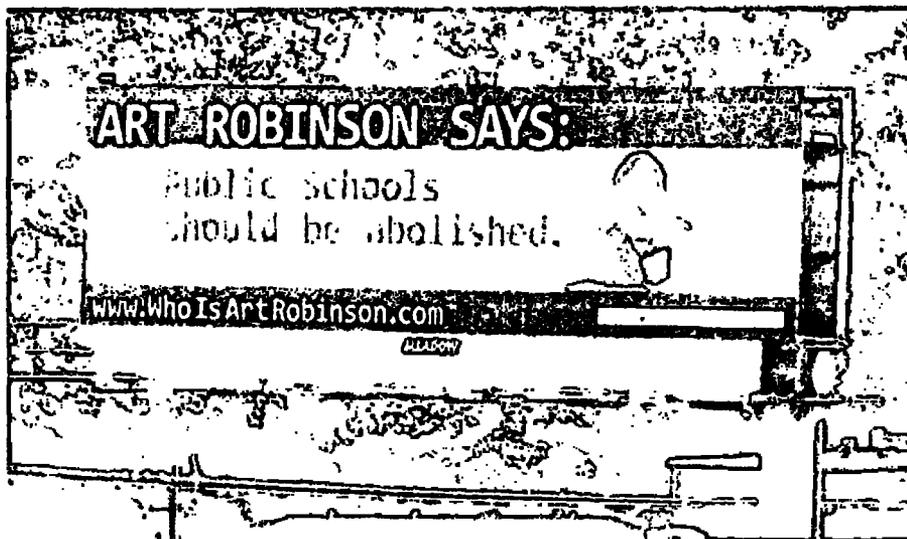
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At first, DeFazio put up billboards with deliberately unreadable disclaimers.

Note that, on the billboard shown below, the DeFazio disclaimer is in the white space under the picture of Robinson. It has been made far too small to read from the highway. There is plenty of space to make it more readable, but this space has not been used. Contrary to the quote, which is lifted out of context, Robinson actually proposed a new, fully-funded Social Security system and said that those already enrolled in the current system should receive all benefits promised, while that system was eventually ended through attrition.

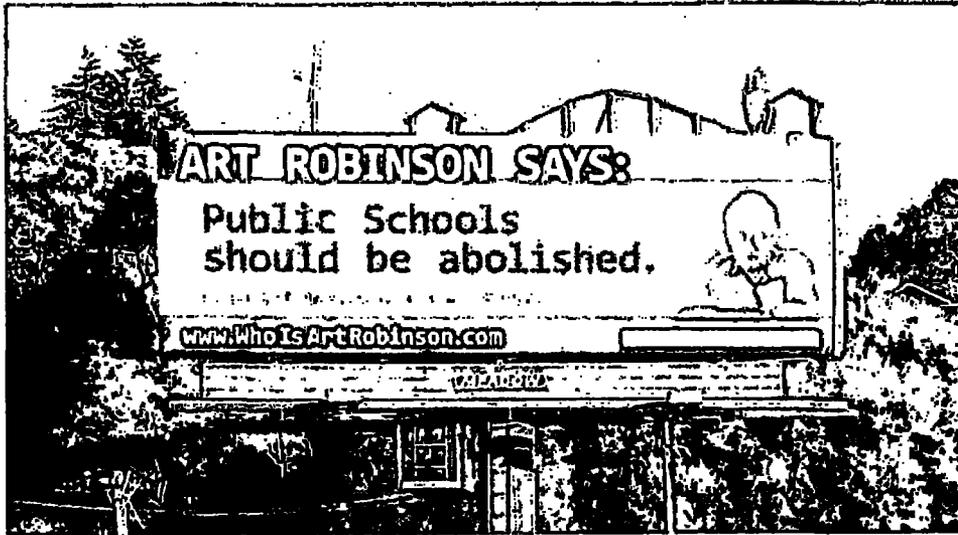


DeFazio Billboard with tiny disclaimer from 2012 – Displayed near Roseburg, Oregon

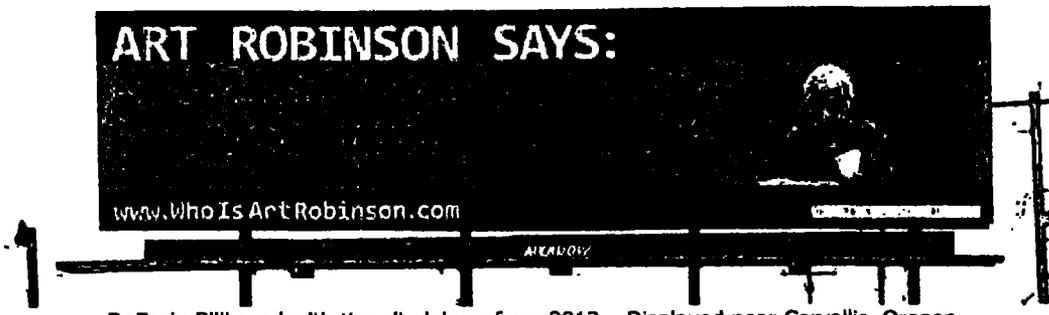


DeFazio Billboard with tiny disclaimer from 2012 – Displayed near Roseburg, Oregon

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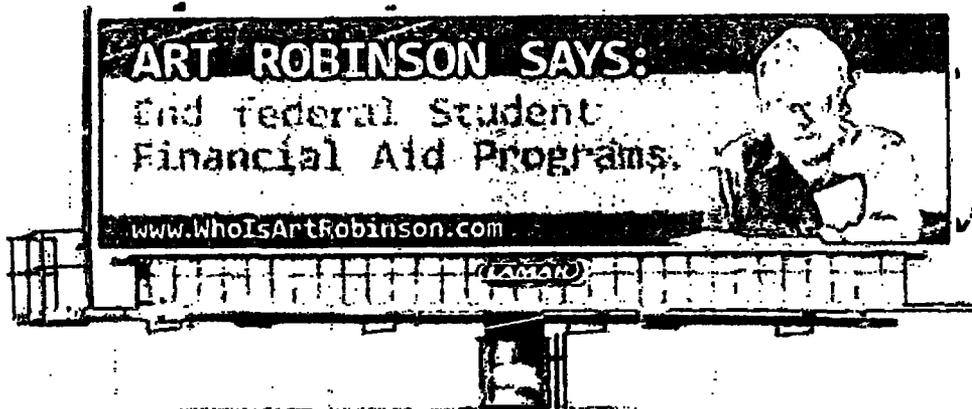


DeFazio Billboard with tiny disclaimer from 2012 – Displayed near Coos Bay, Oregon



DeFazio Billboard with tiny disclaimer from 2012 – Displayed near Corvallis, Oregon

DeFazio then put up billboards with no disclaimers at all.

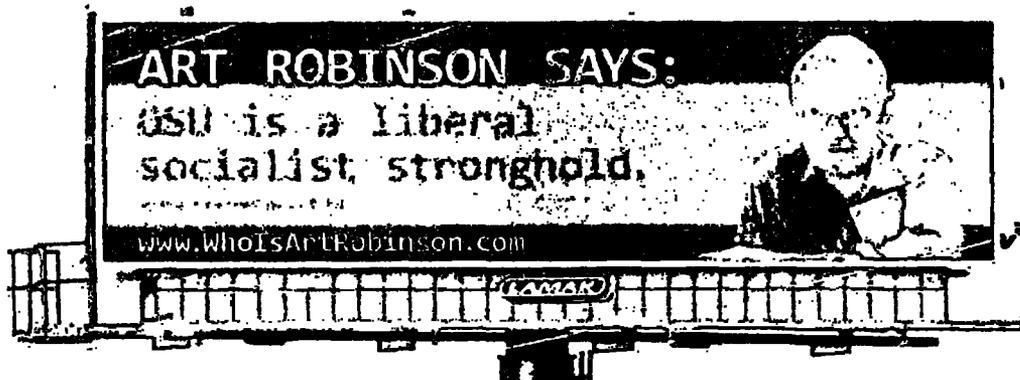


DeFazio Billboard with no disclaimer at all from 2012 – Displayed near Corvallis, Oregon – along the main road to Oregon State University

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Actually, Robinson suggested that student aid programs and all other educational programs should be shifted to the states.

Below is another example at the same location as above (this was a rotating electronic digital board). Art Robinson would never put a billboard like this up on the road to Oregon State University, but DeFazio made voters think he had.



DeFazio Billboard with no disclaimer at all from 2012 – Displayed near Corvallis, Oregon (Oregon State University, OSU, is located in Corvallis)



DeFazio Billboard with no disclaimer at all from 2012 – Displayed near Sutherlin, Oregon (The fine print below the text on the left, is a misleading text reference. There is no disclaimer).

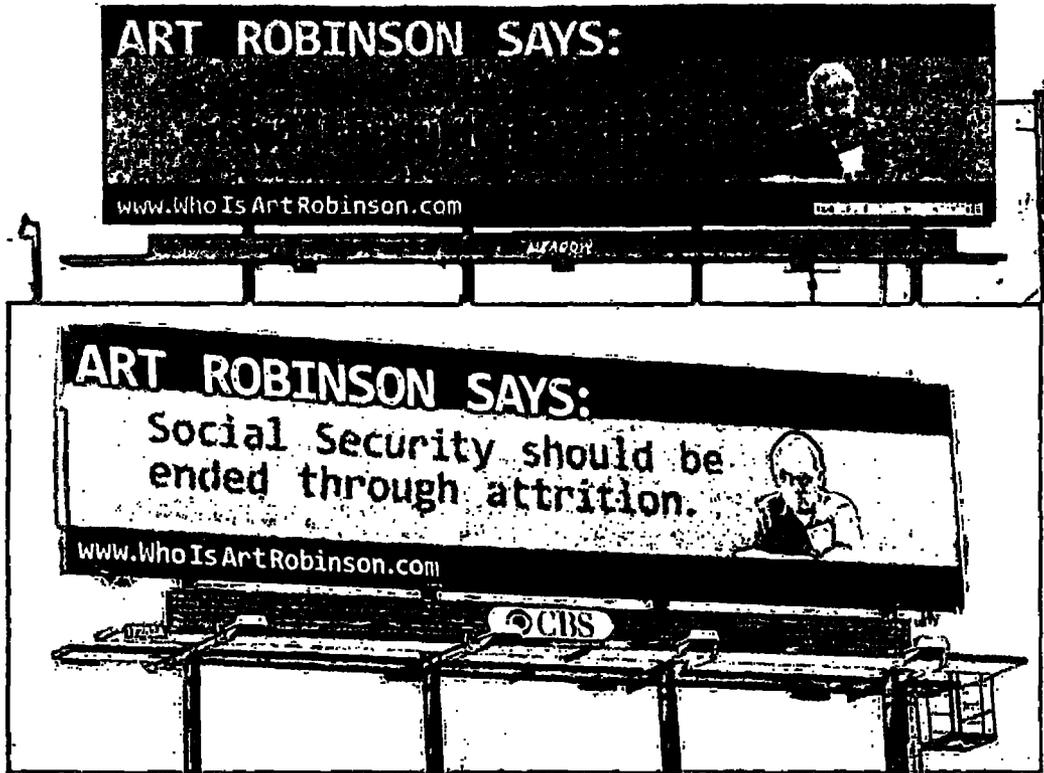
These are photographs of DeFazio billboards. They progressed from too-small-to-read disclaimers in 2010 and 2012 and then to some with no disclaimers at all in 2012.

Polls conducted for Art Robinson by an independent pollster indicated that more than 30% of those who saw these billboards believed they were put up by Robinson. The survey also showed that those voters who thought the billboards were put up by Art Robinson were twice as likely to vote against Art Robinson as those who didn't.

DeFazio later claimed in court documents that the missing disclaimers were errors of the billboard companies which noone either in his campaign or at these companies had noticed.

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After this issue became public he put small disclaimers on those without them. This is an obvious claim for him to make, but it is unlikely to be true. Compare these two billboards:



The billboards above are from different locations, but are the same except one has had its small unreadable disclaimer removed. Is it likely that a billboard was designed and then when used a second time without modification the disclaimer just happened to be left off?

These are ordinary billboards. The OSU billboard with no disclaimer pictured on page 7 was electronic.

We believe (but are not certain) that the one with a small, unreachble, disclaimer went up first. If it was the other way around and one without a disclaimer had been commissioned first and *then* the tiny disclaimer added to the second image, it would show they were aware that some did not have disclaimers and they didn't bother to fix them (this would also be contrary to their claim).

In any case, all of these billboards, even those with small disclaimers, violated CFR 110.11.

For example 110.11(c)1 reads: "*Specifications for all disclaimers.* A disclaimer required by paragraph (a) of this section must be presented in a clear and conspicuous manner, to give the reader, observer, or listener adequate notice of the identity of the person or political committee that paid for and, where required, that authorized the communication. A disclaimer is not clear and conspicuous if it is difficult to read or hear, or if the placement is easily overlooked."

And 110.11(c)2i reads: "The disclaimer must be of sufficient type size to be clearly readable by the recipient of the communication...".

None of these disclaimers were readable by an ordinary driver traveling along the highway. Furthermore the design and construction of the ads, including the selection of photograph, was clearly intended to deceive.

The empty space around the unreadable disclaimers shows that they were deliberately minimized.

Ordinary signage put up by campaigns must, of course, comply with CFR 110.11. However, in most cases a viewer would assume that an ad for a candidate was put up by a candidate's campaign and one against a candidate was put up by an opposing campaign. The disclaimer is just a verification of this. These billboards were deliberately designed to convey the opposite impression and therefore depended on minimizing the disclaimer to produce the desired effect.

The intention was to fit in with DeFazio's campaign that Art Robinson is "pathological" and a "nut" (statements repeatedly made in various forms by DeFazio), by making it look like Art Robinson is even advertising crazy ideas himself. This turned out to be an effective campaign strategy against an unknown candidate, even though the exact opposite is true. Art Robinson's scientific credentials, education and teaching background, medical and basic research accomplishments, and other qualifications are highly unusual and Art Robinson has worked with and gained the respect of many of America's most outstanding scientists and engineers including Nobel Laureates, prominent business figures, astronauts and other outstanding Americans.

While we do not see any particular disclaimer size requirements in CFR 110.11 for billboards (over 24 inches by 36 inches), it is quite clear that the *purpose* of the law is to prevent a candidate (or others) from hiding the source of the advertising. Advertising designed to impersonate another candidate would be one of the most egregious violations of the law's intent.

### **DeFazio Congressional Voters Guide**

Along with his impersonation campaign, DeFazio also sent out a mailing designed to look like it was an independent (almost government official) voter's guide. Reduced sized images are below (it was 11x17). The actual recipient is blacked out. This was mailed at the end of the 2012 election campaign at the same time that the billboards were being displayed.

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# 2012

## CONGRESSIONAL VOTER GUIDE

STRICT



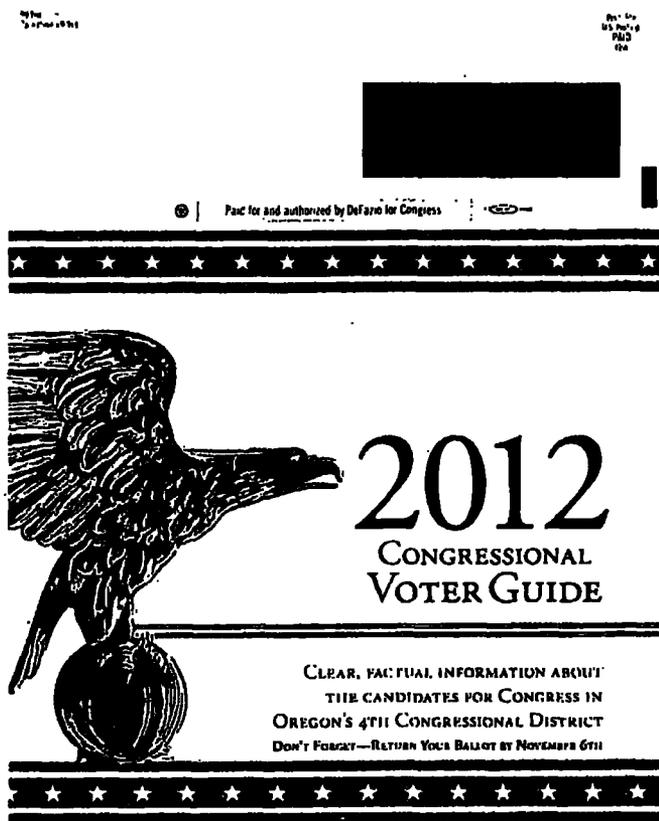
Enlarged Image ↗

CLEAR, FACTUAL INFORMATION ABOUT THE CANDIDATES FOR CONGRESS  
IN OREGON'S 4TH CONGRESSIONAL DISTRICT

### INFORMATION ON THE RACE FOR CONGRESS IN OREGON'S 4TH CONGRESSIONAL DISTRICT

	<b>PETER DEFAZIO</b>		<b>ART ROBINSON</b>	
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>Is a leader in the fight to pass a bipartisan balanced budget amendment</li> <li>Is working to help wounded veterans and their families pay their health care</li> <li>Has voted to raise every congressional pay raise</li> </ul>	<b>NATIONAL DEBT</b>	<ul style="list-style-type: none"> <li>Agreed a pledge referring to the revision of roll-calls and roll-calls</li> <li>Would continue to work to hold the federal government's budget deficit under control</li> </ul>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>Believes women should make the decisions about their own bodies, including in Oregon</li> <li>Believes access to health care should not be controlled by employers or religious institutions</li> </ul>	<b>WOMEN'S REPRODUCTIVE RIGHTS</b>	<ul style="list-style-type: none"> <li>Would make abortion even in the case of rape</li> <li>Believes that if a woman is raped, she should be required to have the child and the possibility of child support is not</li> </ul>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>Believes equality jobs are key to our child and adult economy</li> <li>Is helping to pass a state budget and BIPartisan college and vocational financing</li> <li>Does not support any policies that take away from community college students</li> </ul>	<b>EDUCATION</b>	<ul style="list-style-type: none"> <li>Has said that public education is a key to our system that must be fixed</li> <li>Wants to make the Department of Education funding funding for federal state choice and Pell grants</li> <li>Would public schools work on improving of child abuse</li> </ul>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>Wants to end the war in Afghanistan and bring the troops home</li> </ul>	<b>FOREIGN POLICY</b>	<ul style="list-style-type: none"> <li>Wants to end the war in Afghanistan and bring the troops home</li> </ul>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>Has voted to strengthen Social Security and Medicare</li> <li>Will never support any program or cut that takes benefits from those that have paid for them</li> </ul>	<b>SOCIAL SECURITY</b>	<ul style="list-style-type: none"> <li>Has said he will work to protect Social Security and Medicare and will not be asked to cut them</li> <li>Supports protecting Social Security and will not be asked to cut them</li> </ul>	<input type="checkbox"/>

RETURN YOUR BALLOT BY NOVEMBER 6TH



We realize that this may not strictly be a violation of FEC rules (although we feel it is dishonest in its presentation and it also contains deliberate misrepresentations of Art Robinson's positions). Our understanding is that it is legal because it is covered under the safe harbor provision in 110.11(c)2i with a 12 point disclaimer on the back where readers were unlikely to notice it. DeFazio did successfully mask the author from most readers. A poll we conducted (with 210 respondents) showed that 41% thought it came from an independent organization, 39% were unsure who mailed it, and only 12% thought DeFazio had distributed it (the remaining 8% guessed Art Robinson).

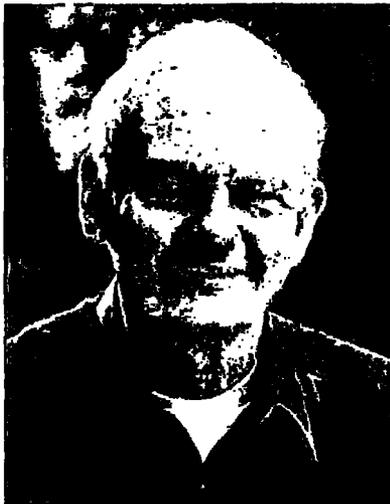
Our purpose in including this is to 1) further demonstrate that DeFazio's campaign includes deliberate deceptions of this type and 2) point out the picture DeFazio used repeatedly of Art Robinson when he was not trying to impersonate him (it appeared in DeFazio TV ads as well). This further shows that the billboard impersonation campaign was deliberate.

Note that the purpose of this flyer was to appear to be from an independent source. So DeFazio made Art Robinson almost unrecognizable in the picture above. This is literally the worst picture we have ever seen of Art Robinson. It must have been an unusual frame from a video (or other source), or simply edited (or both).

Contrast this photo with the ones used at about the same time by DeFazio on the billboards. Voters would not have believed it was Art Robinson's billboard if the picture were this bad, so DeFazio used a medium quality picture.

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Here is a good quality picture of Art Robinson:



Good picture of Art Robinson – Notice the comparison to what DeFazio used above

I include herein this general description of the DeFazio campaign, some of which while dishonest probably falls within FEC rules of acceptability, in order to demonstrate DeFazio's general intent. I believe the billboard disclaimers that were unreadable from the highways and the bill boards with no disclaimers at all are definite violations of FEC rules.

**Use of DeFazio's campaign organization for personal purposes and question about contributions to DeFazio's campaign through his lawyers.**

Oregon has a statute concerning false statements during a political campaign. When polls showed that the DeFazio false billboards with no disclaimers and with unreadable disclaimers and other DeFazio false advertising were very significantly hurting the Robinson campaign effort, Robinson asked an attorney to draft a complaint in Oregon Circuit Court under that statute. (We had been told that such cases are heard immediately and can stop abuses during a campaign.)

The attorney decided instead to file suit under a "false light" statute. Robinson relied on this attorney's advice and the attorney's understanding of State law and allowed him to proceed. Ultimately, after many months of law and motion, the Court decided that this is a federal matter, since it involved a federal campaign. A ruling was issued saying essentially that Robinson had complained in the wrong venue and recommending an FEC complaint be filed.

So, we are filing now, hoping that the FEC can prevent DeFazio from continuing the same actions in 2014. We realize no compensation for damages to Art Robinson can be provided by the FEC.

This lawsuit was filed against Peter DeFazio personally, since these actions were obviously being directly by him personally. It did not list his campaign organization or any other parties as defendants.

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We learned later through court filings that, within 6 hours after this lawsuit was filed (It was strictly confidential prior to filing.), an email was sent by the paid campaign manager of "DeFazio for Congress," Peter DeFazio's official federal campaign organization, to Peter DeFazio and to the attorneys he engaged to represent him, Linda Williams and Dan Meek. Meek and Williams are the co-founders and co-chairs of the Independent Party of Oregon, which has about 100,000 members in Oregon.

This email included, as an attachment, a copy of a contract between "Peter DeFazio for Congress" and these attorneys. The contract and e-mail are appended to this document as Exhibit B. Although it is hard to read because it is partially blocked out, the third page of Exhibit B shows that it is from Liz Cooney [liz@defazioforcongress.com](mailto:liz@defazioforcongress.com), a paid DeFazio for Congress employee, to Peter DeFazio [pdefazio01@gmail.com](mailto:pdefazio01@gmail.com).

The mailing address, telephone, and email address of the client were those of "DeFazio for Congress." The document bears Peter DeFazio's signature. The contract engages the attorneys and specifies that they are to be paid through a contingency if money is recovered from Robinson. (The Court did eventually award them fees, in line with its wrong venue ruling.)

After being hired, these attorneys demanded that "DeFazio for Congress" be added to the lawsuit as a defendant. (DeFazio personally was the only defendant listed in the complaint.) This was to shield Peter DeFazio personally from the claimed damages by asserting that his campaign organization was the miscreant rather than DeFazio himself. DeFazio himself signed an affidavit claiming that "DeFazio for Congress" was responsible.

Even though DeFazio for Congress has an attorney, he was not assigned to the case. So, the attorneys hired by Peter DeFazio for "DeFazio for Congress" actually worked against "DeFazio for Congress" to assign damage to DeFazio for Congress and shield DeFazio personally.

These attorneys were not volunteers. Payment by contingency was agreed to by "DeFazio for Congress."

Thus, Peter DeFazio, employing the help of a paid employee of "DeFazio for Congress," hired attorneys – who were running another political party – for "DeFazio for Congress" for the purpose of shielding himself from a personal liability by transferring the liability to "DeFazio for Congress." DeFazio left "DeFazio for Congress" without legal representation against these attorneys – not even assigning the regular "DeFazio for Congress" attorney to the case.

Later, when the question of fees for the "wrong venue" ruling were at issue in the Circuit Court (of Josephine County, Oregon), the attorneys claimed fees under the contingency agreement in this contract. Yet, they were representing "DeFazio for Congress" and not Peter DeFazio, the primary defendant.

In order to adjust for this, they changed the interpretation and claimed that they had been representing Peter DeFazio personally all along and not "DeFazio for Congress" and ignoring their earlier insistence to the court that "DeFazio for Congress" was responsible. The defendant line in the contract had been left blank. Yet, the mailing address, telephone number, and email address were all of "DeFazio for Congress" and the matter had been handled by a paid employee of "DeFazio for Congress."

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Even under this new (and evidently false) interpretation, however, DeFazio was still making use of "DeFazio for Congress" to shield himself. Under this claim, Meek and Williams were working for DeFazio personally and were asserting a claim against "DeFazio for Congress," while DeFazio himself had left "DeFazio for Congress" without any legal representation at all.

There is abundant evidence that Peter DeFazio personally manages his political campaign very, very closely. Moreover, he was traveling widely in District 4 during the campaign and could not have failed to see the billboards that were erected on Interstate Highway 5 (which bisects District 4 from end to end) and other major thoroughfares in District 4. In filing suit against only Peter DeFazio personally, Robinson was filing against the individual who was damaging him and who was benefiting personally from that damage.

While we would be happy to provide copies of all legal documents associated with this lawsuit if the commissioners would like us to, we have not included them here because they are extensive. DeFazio's lawyers filed hundreds of pages with the court (over what was a fairly simple law and motion issue) and then, after the wrong venue ruling, demanded in excess of \$60,000 for legal fees. The court reduced this to \$15,000, but DeFazio's lawyers refused to accept this and have appealed asking for more (probably more as a form a political harassment than anything else). We do not know when this will be settled.

The result appears to be, however, that after being personally severely damaged by unethical and illegal actions from DeFazio, Art Robinson will be further financially damaged by attempting to have it remedied in court.

After the case is settled, if Art Robinson is in fact forced to pay money to these attorneys (who are politically involved with DeFazio and simultaneously running a separate political party in Oregon, besides working – until settlement – for free for his campaign), it is our intention to inform the FEC of the result and ask their advice. We are concerned that any payment in excess of \$2600 may be considered a contribution to DeFazio's campaign and therefore be illegal.

**Related False statements under penalty of perjury**

The Circuit Court lawsuit turned into something of a public record circus, with Meek and Williams repeatedly filing large parts of the DeFazio "straw man" campaign in the Court in an apparent effort to prejudice the Court.

Thus, attorneys Meek and Williams became a side issue because they are co-founders and co-Chairs of the Oregon Independent Party and were hired by DeFazio less than six hours after the lawsuit was filed.

Dr. Robinson won the Oregon Independent Party nomination in 2010 in a primary in which he defeated DeFazio by a wide margin of 56% to 39%. Whereupon, the Independent Party led by Meek and Williams came out publically against their own nominee, Robinson, in 2010 and also refused to allow Robinson to run in their primary in 2012. Most registrants of this party are

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thought to be Oregonians who erroneously think they are registering "Independent." These voters are generally closer to Robinson's views than DeFazio's.

An effort was made by DeFazio, Meek, and Williams therefore, to claim that DeFazio found Meek and Williams after an extensive search for representation.

To bolster this, DeFazio submitted a sworn affidavit under penalty of perjury to the Circuit Court claiming that, *after he was served* with the Robinson lawsuit, he carried out an extensive search for representation, which eventually led him to Meek and Williams. (See attached DeFazio affidavit.)

This affidavit by DeFazio under penalty of perjury is false.

Six hours after the lawsuit was filed, a paid employee of "DeFazio for Congress" emailed to Meek, Williams, and DeFazio a copy of the contract signed by DeFazio agreeing to representation in the Robinson lawsuit, payment of the attorneys by contingency, and bearing email, physical address, and telephone contact information for "DeFazio for Congress." DeFazio was not served with this lawsuit until two days after this email..

Moreover, billing records of Linda Williams show her working on this case for DeFazio before he was served.

Meek and Williams, co-Chairs of the Independent Party, are apparently trusted associates of DeFazio who, contrary to his sworn declaration, he contracted to represent him immediately upon hearing that he had been sued.

### **Related information**

Robinson has never caused to be filed any FEC complaint against DeFazio. On the other hand, DeFazio has instigated at least 2 FEC complaints against Robinson, filed on his behalf by the Democrat Party. DeFazio has also been behind other harassment complaints filed in Oregon with the Oregon Secretary of state and publicized in Oregon. While all of these complaints were filed by separate entities of the Democrat Party, we understand this is normal with this type of harassment. It is clear from the documentation that they had DeFazio and his campaign's support and encouragement.

DeFazio FEC complaints have been filed against Robinson; his employer the Oregon Institute of Science and Medicine; Althouse Press a personal publishing enterprise of Robinson's, Noah Robinson, Robinson's son and Treasurer of his campaign; Robinson for Congress; and even Arnold Jagt, a colleague of Robinson's in Michigan who markets educational materials that Robinson developed.

The Oregon Institute of Science and Medicine is a (501)c(3) public foundation for medical and biochemical research that Robinson has headed for 33 years. It is entirely funded by private individual and private foundation donors and has been kept entirely isolated from all political activities.

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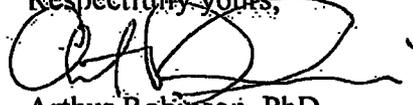
These DeFazio complaints have cost the Robinson campaign large amounts in legal costs to defend, and they were all dismissed.

**Summary**

In the foregoing, we have mentioned those things necessary to provide an understandable narrative of these events in Oregon, and we have attached some documents in support. We assume that the FEC will request additional materials that are deemed relevant.

We have placed emphasis upon the billboard disclaimers, since we are sure these were illegal, but have also provided other supporting information that the FEC should be aware of.

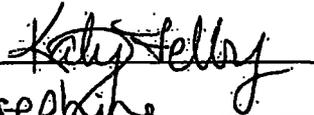
Respectfully yours,



Arthur Robinson, PhD

Subscribed and sworn to before me under penalty of perjury this 23<sup>rd</sup> Day of June, 2014.

By ARTHUR Robinson

  
\_\_\_\_\_  
State of Oregon County of Josephine



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## ATTORNEY RETAINER AGREEMENT

Linda K. Williams ("Client") hereby retains and authorizes Daniel Meek and Linda K. Williams ("Attorneys") to represent Client in the following matters and in the following scope:

Initial Defense to action filed against Client in Josephine County Circuit Court by Art Robinson, including (1) factual review, preparing and filing Special Motion (ORS 31.150, *et seq.*), and if necessary, (2) an appeal from a final order re: Special Motion.

1. Compensation of Attorneys.

- a. Compensation for the Attorneys is contingent upon success upon fee-shifting provisions of the Special Motion and application to the Court for award of fees against Plaintiff. Attorneys will keep detailed time records for court review. Attorneys will not seek additional compensation from Client in addition to any fees awarded by the Court for costs and attorney fees for the duties described above. Client will cooperate with the Attorneys in requesting fee award.
- b. Client agrees that attorney is entitled to reasonable compensation for any services rendered and that Client has a good faith obligation to take no action to impede, compromise or settle claims for fees if proposed by a defendant without discussion and agreement of attorney.

2. Duties of Client.

- a. Client will cooperate with attorney and others in matters relating to the representation, such as producing documents, remaining in contact with current address, and appearing when required or ordered to do so by the Court.
- b. Client is responsible for reasonable and necessary expenses incurred in the course of representation, filing, service of process and fees for motions and other charges imposed by the court, copying costs and travel expenses, regardless of outcome.

3. Attorneys and Client Further Agree:

- a. Client may discharge Attorneys at any time. Such discharge shall be in writing. If Client discharges Attorneys in a time or manner which prevents Attorneys from requesting a fee award from the Court under ¶ 1, Client shall be responsible for reasonable compensation to Attorneys for the time invested in the representation until the time of discharge.
- b. All costs incurred by Attorneys which have not been compensated up until the time of discharge must be paid, or Attorneys may decline to relinquish documents held in her possession until such charges are paid.

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- c. Attorneys have the right to withdraw representation of Client, when required or permitted by the Code of Professional Responsibility, including if Client makes it unreasonably difficult for Attorneys to carry out the representation.
- d. No settlement of the suit on the merits will be made without full discussion and agreement between the Client and Attorneys.

4. The parties shall use these addresses and information to communicate unless changed by written notice:

**Client**

**Attorneys**

POB 1316

SPRINGFIELD, OR 97478

phone: 541-485-1622

email: campaign@defazioforcongress.org

Linda K. Williams  
 10266 S.W. Lancaster Road  
 Portland, OR 97219  
 503 293-0399 voice  
 866 795-9415 fax  
 linda@lindawilliams.net

signature:

  
 Peter Defazio

printed name:

date signed:

22 Oct 2012

**For Attorneys:**

signature:

printed name:

date signed:

Linda K. Williams	Daniel Meek

17044410019

Re: Robinson \$1 million lawsuit

**Subject:** Re: Robinson \$1 million lawsuit

**From:** [REDACTED]

**Date:** 10/22/2012 4:29 PM

**To:** Dan Meek <dan@meek.net>

**CC:** [REDACTED], Linda Williams <linda@lindawilliams.net>

Dan- Here is the signed retainer. Let me know if you need anything else.

[The sender is blocked out, but readable as Liz Cooney <liz@defazioforcongress.org>. Likewise a carbon copy was sent to Peter DeFazio (also blocked out).]

**Exhibit EE**

**Second Declaration of Linda K. Williams**

**FEC Exhibit B**

14-00000-1